

Ökodesign-Webinar

How to get involved

WKO, BSI, FMTI & Orgalim
17.10.2024



DIE METALLTECHNISCHE INDUSTRIE

Ablauf des Webinars



Webinar wird aufgezeichnet

Folien & Aufzeichnung

Aufzeichnung und Folien werden online gestellt und sind ab 21.10.2024 auf ESPR Homepage abrufbar

Heute 1,5 h: 1 x 50 min Vortrag und 30 min Q&A

Dauer

Künftige Webinare 1-1,5 h je nach Thema

Fragen können über **Slido** gestellt werden

Fragen

Antworten nach ca. 60 min

Wer trägt heute vor?

Vortragende **Stephanie Mittelham**
Manager Green Transition, Orgalim

Moderation **Ulrike Witz**
FMTI, WKO

Clemens Rosenmayr
BSI, WKO

Heinz Pecina
UP, WKO

Ökodesign Homepage

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Ökodesign Homepage online

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www.wko.at/energie/espr

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Neue Themen in FAQ

Unsere Webinarreihe

Webinare

Teil 1 | 28.05.2024 um 14.30 Uhr (1,5 h)
Ökodesign - Allgemeine Vorstellung

Teil 2 | 25.6.2024 um 14.00 Uhr (1,5 h)
Der Digitale Produktpass - DPP

Teil 3 | 16.09.2024 um 13.00 Uhr (1,5 h)
Auswertung der Daten des DPP mit KI & Rechtsschutz

Teil 4 | 17.10.2024 um 13.30 Uhr (1,5 h)
How to get involved

Teil 5
Marktüberwachung in Österreich

In Planung

Teil 6
Leitprojekt zum DPP in Österreich

Teil 7
Best Practice der Vorbereitung in Unternehmen

Teil 8
Deep Dive zu den ESPR-Anforderungen

Teil 9
ESPR & DPP und weitere Berichtspflichten

Was ist Ökodesign unter der ESPR?

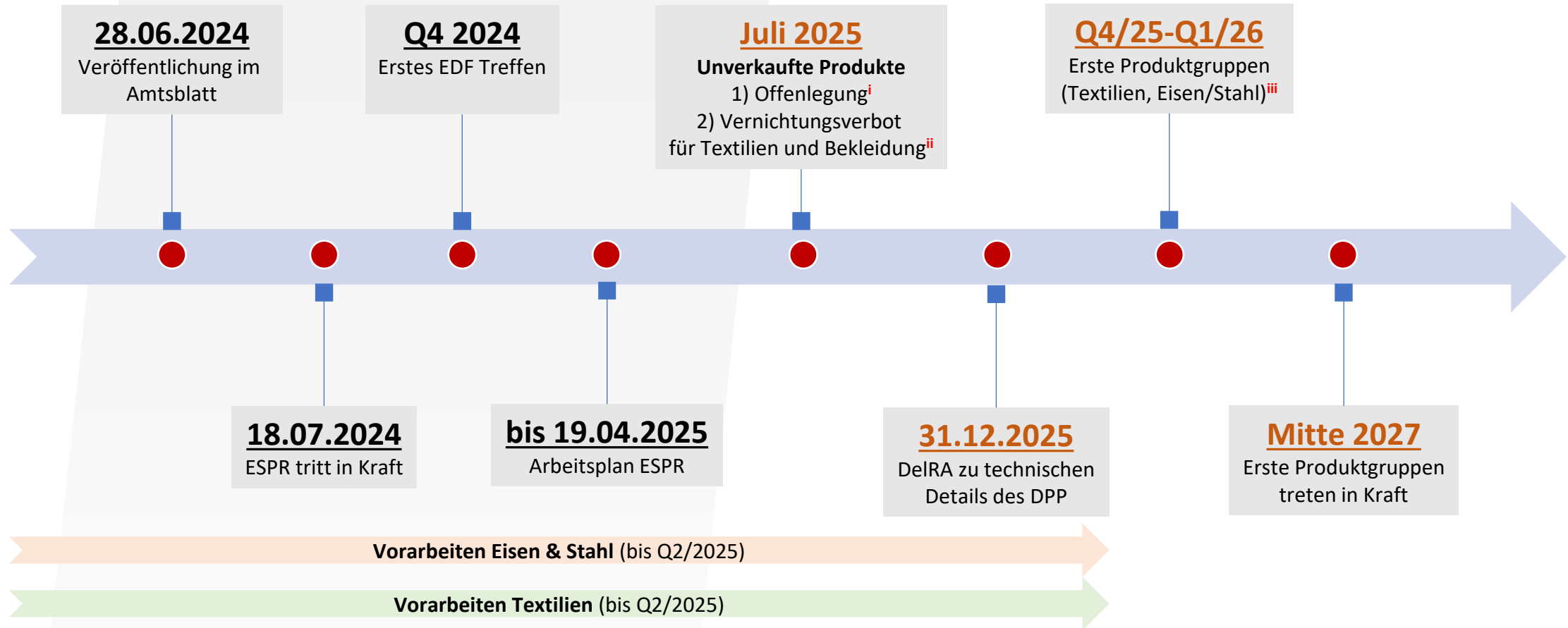
ESPR regelt Design und Herstellung von Produkten (inkl. Handel)

- ESPR will Grundlage für die Einführung der Kreislaufwirtschaft sein
 - Die Rohstoffe sollen möglichst lange im Kreislauf geführt werden können
- ESPR bietet den Rahmen
 - Spätere Rechtsakte regeln Produktgruppen
- Design und Herstellung
 - Ergänzende Vorschriften: Recht auf Reparatur, Green Claims, ...
- Betroffene Produkte: Nahezu alle physischen Produkte
 - Ausnahmen sehr überschaubar
- 16 Ökodesign Anforderungen (inkl. Energieverbrauch)
 - Bisher nur Energieverbrauchsrelevanz
- Informationen über den Digitalen Produktpass (DPP), Label, Papier, WWW
 - DPP ist neu und das zentrale Medium
- Leistungs- und Informationskriterien
 - Sollen Produkte laufend verbessern, Kunden informieren und Behörden Überwachung ermöglichen

Heutige Fragestellungen

- Wie sieht der Zeitplan aus?
- Wie entstehen die neuen ESPR Regeln?
- Was ist die Rolle des Ökodesign Forums?
- Wie setzt sich das Forum zusammen und wer kann dabei mitmachen?
- Welche Produkte sollen priorisiert werden?
- Welche Vorarbeiten sind bereits angelaufen?
- Wie läuft die Arbeit in einer Expertengruppe der Europäischen Kommission praktisch ab?
- Gibt es weitere Möglichkeiten, sich einzubringen?

Wo steht die ESPR heute?



Abkürzungen

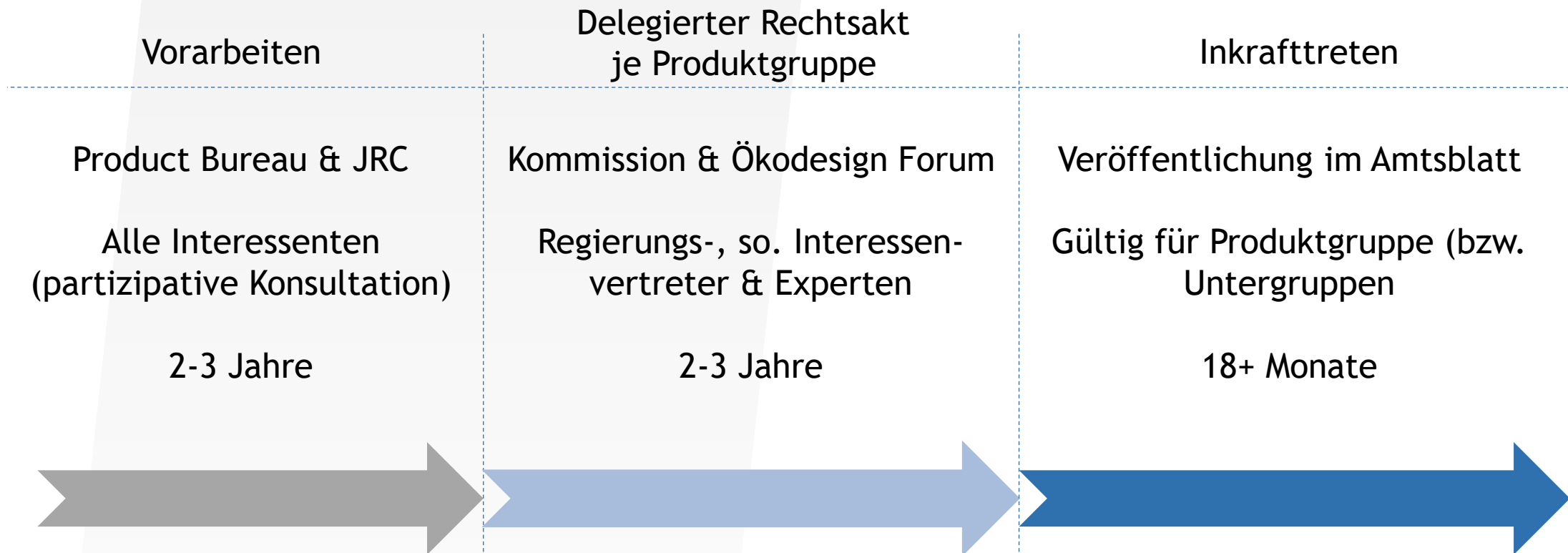
DeIRA...Delegierter Rechtsakt
DfRA...Durchführungsrechtsakt
DPP...Digitaler Produktpass

EDF...Ökodesign Forum
EP...Europäisches Parlament

- ⁱ DfRA (12M ab Inkrafttreten)
- ⁱⁱ DeIRA mit Übergangszeiträumen (12M ab Inkrafttreten)
- ⁱⁱⁱ Danach 2-3 pro Jahr

Wie entstehen die neuen ESPR Regeln?

Wie kommt es zu den neuen Regeln für die verschiedenen Produktgruppen bzw. Produkte? (Schema)



Rolle des Ökodesign Forums

- Art. 19 ESPR: "[...] Sachverständigengruppe [...], an der von den Mitgliedstaaten benannte Sachverständige und alle an dem in Rede stehenden Produkt oder der in Rede stehenden Produktgruppe interessierten Kreise ausgewogen und wirksam beteiligt sind."
- Aufgaben:
 - a) Ausarbeitung von Ökodesign-Anforderungen
 - b) Ausarbeitung von Arbeitsplänen
 - c) Prüfung der Wirksamkeit der festgelegten Marktüberwachungsmechanismen
 - d) Beurteilung von Selbstregulierungsmaßnahmen
 - e) Beurteilung des Verbots der Vernichtung unverkaufter Verbraucherprodukte zusätzlich zu denen, die in der Liste in Anhang VII enthalten sind.
- Sachverständigen-Untergruppe aus Vertretern der Mitgliedstaaten, die sich insbesondere mit Punkten a) & d) beschäftigen sollen und sich zur Umsetzung/Einhaltung der ESPR austauschen sollen

Zusammensetzung des Ökodesign Forums

- “Experts designated by Member States; **industry representatives, including from SMEs and craft industry**; social enterprises; trade unions; **traders, retailers and importers**; consumer and environmental organisations; **actors involved in circular economy activities**; European standardisation organisations; and researchers”
- Kommission kann auch zusätzliche Beobachter nominieren
- Kommission schließt derzeit nicht aus, dass Fokus auf Branchenverbänden bzw. Organisationen liegen wird (= keine einzelnen Unternehmen)
- Überlegungen zu Unterstützung für KMU zur aktiven Teilnahme

Produktpriorisierung

- Kommission analysiert den potenziellen Beitrag dieser Produkte zur Verwirklichung der Klima-, Umwelt- und Energieeffizienzziele der EU, darunter u.a. folgende Aspekte:
 - Potenzial zur Verbesserung der Produktaspekte, ohne unverhältnismäßige Kosten zu verursachen
 - Verkaufs- und Handelsvolumen dieser Produkte in der EU
 - Verteilung der Klima- und Umweltauswirkungen, des Energieverbrauchs, des Ressourcenverbrauchs und des Abfallaufkommens dieser Produkte entlang der Wertschöpfungskette
- (Mind.) 3-jährige Arbeitspläne zur Bearbeitung der Produktliste
- 1.Arbeitsplan muss bis 19.04.2025 erlassen werden

Bereits identifizierte Produkte

Eisen & Stahl

Chemikalien

Möbel
inkl. Matratzen

Waschmittel

Textilien
v.a. Bekleidung &
Schuhwerk

Aluminium

Reifen

Anstrichmittel

Schmierstoffe

IKT & sonstige
Elektronikgeräte

Energieverbrauchs-
relevante Produkte

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www.wko.at/energie/espr

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Neue Themen in FAQ





How to get involved in the ecodesign measures for sustainable products?

Ecodesign webinar, 17 October 2024

Stéphanie Mittelham, Orgalim

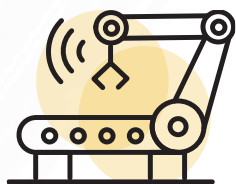
Manager Green Transition

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- How can companies get involved in practice?
- Conclusions
- Discussion

About Orgalim

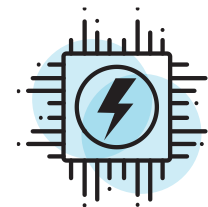
Europe's largest industrial branch



Mechanical
Engineering



Metal
Technology



Electrical Engineering,
Electronics, ICT



Annual turnover

2,835
billion EUR



Direct employment

11.7
million people



Annual exports

789
billion EUR



Our industries comprise of

770,000
companies

Membership

49 Member Associations, 10 Corporate Members, 21 Countries



National Associations

Austria
FMTI



Belgium
AGORIA



Croatia
Croatian Chamber of Economy
HUP



Denmark
DI



Finland
Technology Industries of Finland



France
FIEEC
FIM



Germany
VDMA
WSM
ZVEI



Great Britain
BEAMA
GAMBICA



Ireland
Ibec



Italy
ANIE
ANIMA



Latvia
MASOC



Lithuania
LINPRA



Luxembourg
FEDIL Metal



The Netherlands
FME
METAALUNIE



Norway
Norsk Industri



Portugal
AIMMAP



Slovenia
GZS-CCIS



Spain
SERCOCBE



Switzerland
SWISSMEM



Sweden
TEKNIKFÖRETAGEN



Associate members

Turkey
MAKFED



Sector Associations

AFECOR
AQUA
CECAPI
CECE
CEIR
CEMA
CEMEP
CEO
C.E.F.A.C.D.
EFCCEM
EGMF
EUNITED
EURALARM
EUROPACABLE
EUROGEN
EUROPUMP
FARECOGAZ
FEM
FEPA
PNEUROP
T&D Europe



Orgalim for Corporates

AMAZON
DANFOSS
EATON
FASTEMS
PEPPERL+FUCHS
PHOENIX CONTACT
SCHNEIDER ELECTRIC
SIEMENS
SMITHS
TEXAS INSTRUMENTS



Industrial technologies are at the heart of Europe's transformation

Industry 4.0



Energy System



Circular Economy



Smart Buildings



Connectivity & Networks



Infrastructure & Mobility



Organisation

GOVERNANCE - STATUTORY

Board of Directors

General Assembly

Presidents' Board

Executive Forum for
Advanced Manufacturing

POLICY STRATEGY

Policy Committee

Industrial Strategy
Coordination Team

WG Chairs network

WORKING GROUPS & TASK FORCES

Digital
Transformation

Cybersecurity

Internal Market

- Machinery
- Pressure Equipment
- Construction Products
- Electrical
- Standardisation

Legal Affairs

Green Transition

- Chemicals
- Waste
- Corporate Sustainability
- Energy Resilience

Economics &
Statistics

R&D and
Innovation

Trade Policy

Orgalim Participation in Expert Groups

	Commission Expert Groups	Non-Commission Expert Groups
Horizontal	Commission Expert Group "Industrial Forum"	Consultative Commission on Industrial Change - EESC
Internal Market	High-Level Forum on European Standardisation Commission Expert Group on Machinery Commission Expert Group on Radio Equipment European Multi-Stakeholders Platform on ICT Standardisation Low Voltage Directive Working Party Noise Expert Group Working Group Gas Appliances Working Group Pressure Equipment Construction Products Regulation (CPR) Acquis -Subgroup 5 Sustainability Commission Expert Group on Equipment and Protective systems for use in potentially Explosive Atmospheres (ATEX Products)	CEN CENELEC Machinery Sector Forum CEN CENELEC Industry Advisory Forum CEN Technical Board CENELEC Technical Board CEN-CENELEC-ETSI Coordination Group on Smart Manufacturing & Task Group Industrial Data European Accreditation Advisory Board
Environment	Ecodesign and Energy Labelling Consultation Forum Commission's Expert Group on Circular Economy and Sustainable Production and Consumption Commission Expert Group accompanying future substance reviews under Directive 2011/65/EU Commission Expert Group CARACAL - Competent Authorities for Registration, Evaluation, Authorisation and restriction of Chemicals (REACH) Expert Group on the exchange of information on Best Available Techniques related to industrial emissions (IED Article 13 Forum)	European Chemicals Agency (ECHA) - Risk Assessment Committee (RAC) and Socioeconomic Analysis Committee (SEAC) meetings

Orgalim Participation in Expert Groups

	Commission Expert Groups	Non-Commission Expert Groups
Corporate Sustainability	Commission Platform on Sustainable Finance	
Energy	Smart Grids Task Force (Q3-4 2024 =Smart Energy Expert Group) European Technology & Innovation Platform Smart Networks for Energy Transition Commission Expert Group on electricity interconnection targets European Stakeholder Committee on System operation codes and grid connection codes	European Stakeholder Committee on Grid Connection European Stakeholder Committee on System Operation
Trade	Trade Contact Group Informal Expert Group on CBAM	
Digital	European Data Innovation Board Expert Group on B2B data sharing and cloud computing contracts	Stakeholder Cybersecurity Certification Group – ENISA (EU cybersecurity agency)
RDI	Commission Expert Group on the ERA Forum for Transition	
Legal Affairs		Observatory on IP Infringements - European Intellectual Property Office

Recap about the new Ecodesign for Sustainable Products Regulation (ESPR)

ESPR in a nutshell

¹³ESPR is an EU framework legislation with no obligations. Product-specific measures will be developed with obligations only for certain products

27 Oct 24

ESPR establishes a framework legislation

ESPR =
framework
legislation

It does not set
specific measures.
Rather, it enables
their later
adoption

Framework legislation

Product-specific measures
based on detailed impact
assessment

Ecodesign: new EU rules to make
sustainable products the norm

Press Releases [PLENARY SESSION](#) [ENVI](#) 23-04-2024 - 12:53

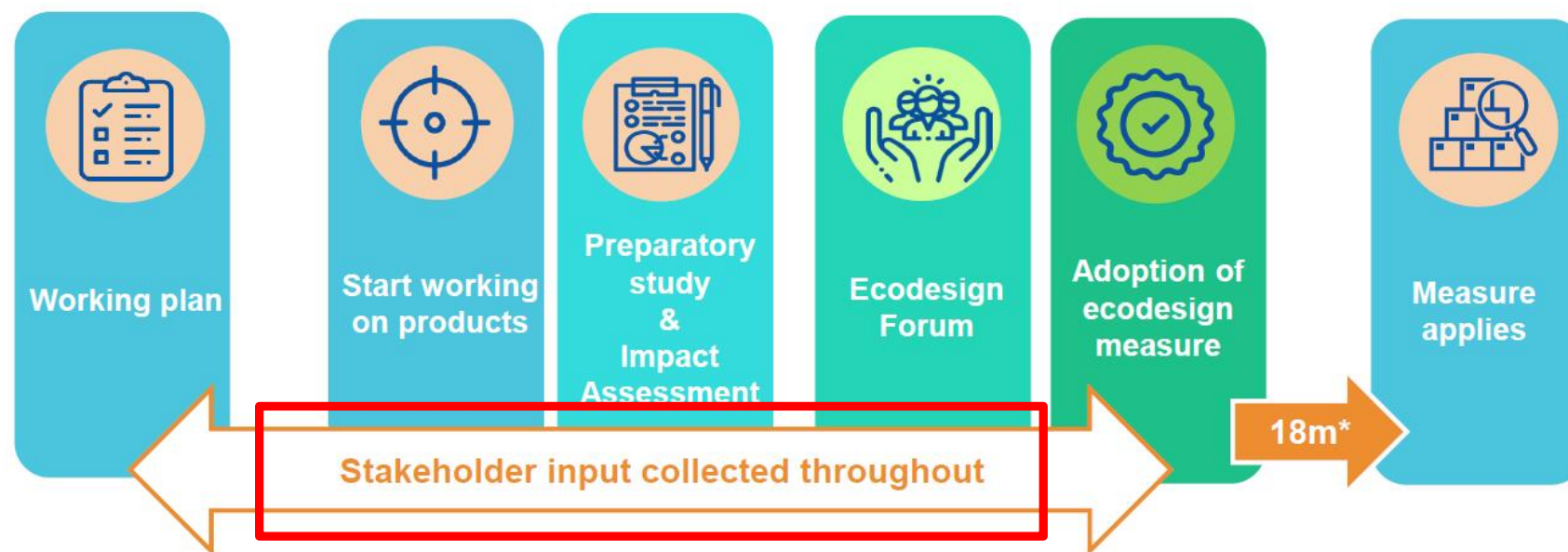
multiannual working
plans setting out priorities



The Ecodesign for Sustainable Products [Regulation](#) (ESPR) was published in the Official Journal of the EU on 28 June 2024 and entered into force on 18 July 2024

How does ESPR work?

Setting product requirements under ESPR



*Not earlier than 18m, shorter periods possible in duly justified cases, staggered application of specific requirements possible



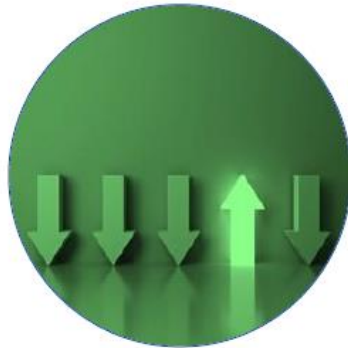
How does ESPR work?

ESPR sets a new sustainability & ecodesign approach



Broad scope

Moving beyond energy-related products to a **wide product scope**



New sustainability & ecodesign aspects

e.g. **performance requirements** - durability, CO₂ footprint, recycled content



Horizontal measures

Common ecodesign requirements for products with similarities



Strong focus on product information

Digital Product Passport, labels & information requirements



How does ESPR work?

Horizontal measures



Horizontal ecodesign requirements: two or more product groups display similarities allowing a product aspect to be effectively improved based on common information or performance requirements



Recital – on importance of horizontal requirements concerning **durability and repairability**



Initial ideas explored (incl. in JRC report) focus on: **Reparability, Durability, Recyclability, post-consumer recycled content, light-weight design & sustainable sourcing**



Key product aspects under ESPR



- Not all these requirements will be requested in the future product-specific measures (ESPR Delegated Acts).
- The impact assessments will decide product by product which product aspects should be regulated for which products

Digital Product Passport (DPP)

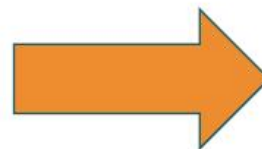
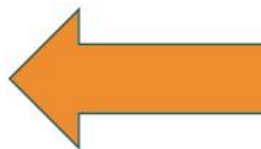
1. What is the Digital Product Passport? (ctd.)

- The DPP will simplify digital access to product-specific information related to sustainability, circularity, and legal compliance.
- It will set data access Ecodesign requirements for products, complementing the physical Ecodesign requirements.
- It is not a track & tracing tool, but it will allow traceability information when appropriate.
- The DPP-system shall build on existing best practices at international level, while also allowing the possibility of using new technologies and approaches.

Digital Product Passport (DPP)

2. DPP main design features

DPP-system



DPP-data



(the **"HOW"**. To be developed horizontally for all product groups and legislations)

(the **"WHAT"**. To be developed through **product-group specific dedicated legislation**)

- The DPP registry
- A searchable Web Portal
- All standards and protocols related to IT architecture:
 1. Unique identifiers
 2. Data carriers and links between physical product and digital representation
 3. Access rights management, information security, and business confidentiality
 4. Interoperability (technical, semantic, organisation)
 5. Data processing , data exchange protocols, and data formats
 6. Data storage, archiving, and data persistence
 7. Data authentication, reliability, integrity
 8. APIs for the DPP lifecycle management and searchability

Information to be included in the DPP will be **product-group specific** and identified in delegated act process.

It may include information/data on one or more of the following areas:

- Technical performance
- Environmental sustainability performance
- Circularity aspects (durability, reparability, etc)
- Legal compliance
- Product-related information (e.g., manuals, other labels)

Digital Product Passport (DPP)

3. What will companies need to do?

Make sure that:

- a product passport **exists**, and it is in compliance with essential requirements established in articles 9 and 10 – exceptions are possible
- the product passport is **complete**, meaning it includes all the mandatory information listed in the corresponding product group-specific Delegated Act.
- the information included in the passport is **authentic, reliable** and **verified** in accordance with requirements established in the corresponding product group-specific Delegated Act.
- a **back-up copy** of the DPP is stored by a [certified] third-party product passport service provider.
- A copy of the data carrier or unique product identifier are made available to **dealers** and **online market places** selling the corresponding product.

Digital Product Passport (DPP)

4. Implementation work ahead

Many Commission services are actively contributing to its design and deployment (DGs CNECT, DIGIT, ENER, ENV, GROW, JRC, TAXUD)

- Rules and requirements to be followed by **DPP service providers**, including a certification scheme to verify such requirements (via delegated act).
- Procedures to issue and verify the **digital credentials of economic operators and other relevant actors** that shall have access rights to DPP information (via implementing act).
- Rules and procedures related to **unique identifiers and data carriers' lifecycle management** (via delegated acts)
- Design and set-up the **DPP registry**.
- Design and set up the **DPP web portal**.
- Definition of **standards** (by 31 December 2025).

ESPR implementation work ahead

6. Implementation work ahead

- Availability of harmonized standards on DPP-system by **end of 2025**.
- Adoption of Acts on "DPP governance" in **2025**.
- EC-driven activities to support DPP implementation by companies (especially SMEs), DPP service providers, Member States in **2026**.
- The adoption of the first ESPR Delegated Acts (textiles, steel) may happen in Q3-Q4 2025. Considering that there is an 18 months delay of entry into force for each Delegated Act (to allow economic operators to comply with the new requirements), the expected entry into force of the first ESPR Delegated Acts is expected around **mid 2027**.
- Requirements on DPP will have the same entry into force as the corresponding product specific Delegated Acts, with one notable exception: the DPP for **batteries** will entry into force in **February 2027**.

23 Only the products in the scope of the ESPR Working Plan will be regulated & have a Digital Product Passport

17-Oct-24

ESPR Working Plan

- WP minimum of 3 years, covering ecodesign requirements, including horizontal requirements, and the possible prohibition of destruction of unsold consumer goods.
- First working plan to be adopted in the first 9 months of ESPR implementation and include:

INTERMEDIATE PRODUCTS

- Iron and Steel
- Aluminum

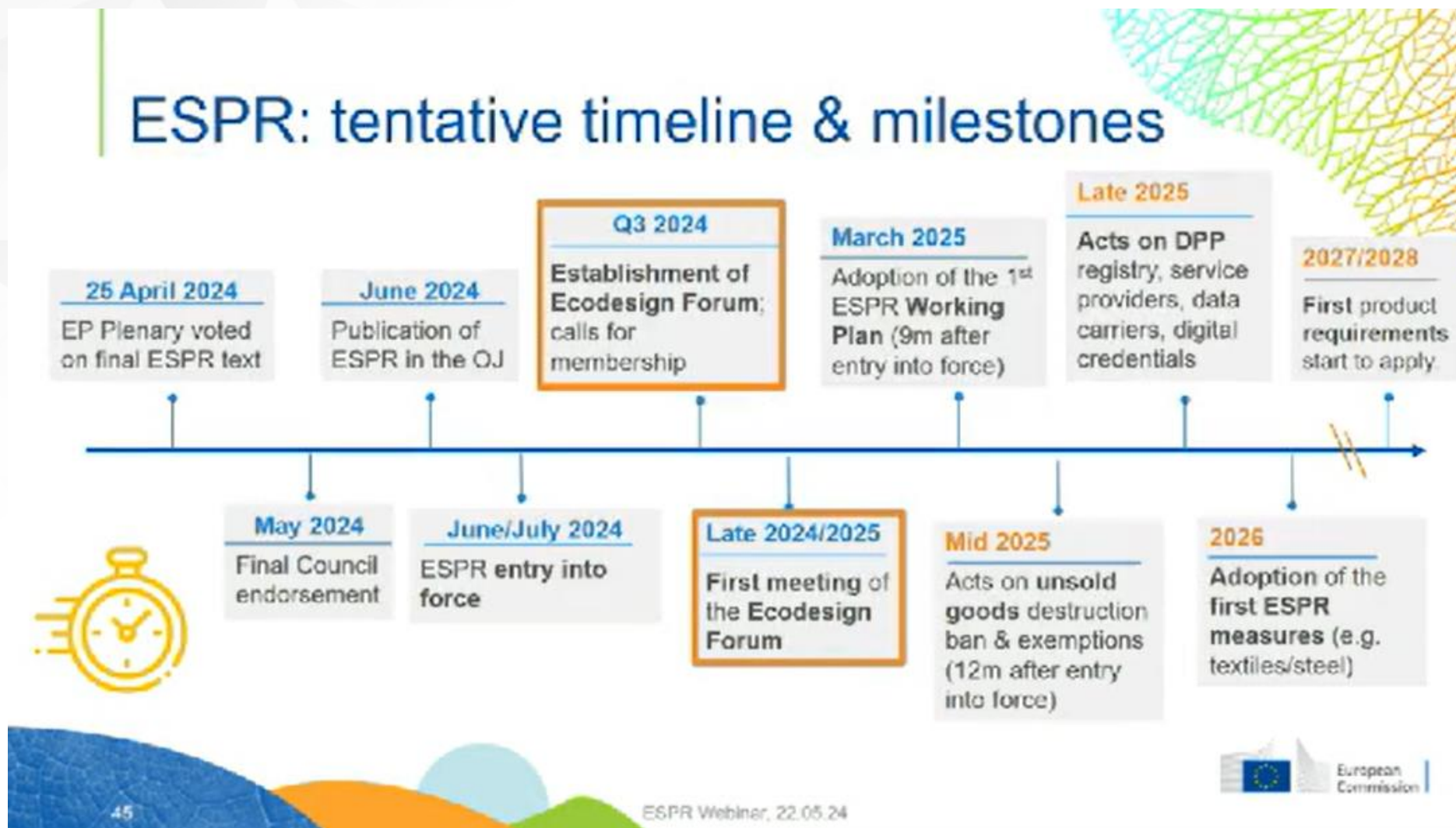
FINAL PRODUCTS

- Textiles (in part. garments & footwear)
- Furniture, including mattresses
- Tyres
- Detergents
- Paints
- Lubricants
- Chemicals
- Energy related products
- Information & communication technology products and other electronics

- Justification must be provided for inclusion or exclusion of products.

- This is a DRAFT ESPR Working Plan meaning that the list of products might change.
- Final ESPR Working Plan is expected to be published in March 2025

ESPR timelines



New Commission FAQ on ESPR

New ESPR [FAQ document](#) from the Commission



Ecodesign for Sustainable Products Regulation:

Frequently Asked Questions (FAQ)

Directorate-General for Environment

Directorate-General for Energy

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs

New ESPR [FAQ document](#) from the Commission

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Why should companies get involved?

Why should companies get involved?

- To prepare **YOUR** future!
- To influence the upcoming future product-specific measures (ESPR Delegated Acts) that will contain new mandatory obligations for companies for certain products in the scope of ESPR Working Plan
- To make sure the proposed new requirements will be implementable in the real life by companies of all sizes and in particular for SMEs
- To transform the challenges of today into business opportunities for tomorrow



When should companies get involved?

When should companies get involved?

- **As soon as possible** to be ready when the new ESPR requirements will become a reality



How should companies get involved?

How should companies get involved?

- By providing companies' expertise and knowledge to:
 - National associations and sector associations eg. WKO and FMTI in Austria
 - Associations at EU level eg. ORGALIM to support Orgalim providing solid input from Europe's Technology Industries to:
 1. The future Ecodesign Forum to be established
 2. The ongoing ESPR preparatory study on iron & steel products (+ textiles)
 3. The ongoing EU funded CIRPASS-2 project
 - To the ongoing standardisation activities in the CEN-CLC/JTC 24 'Digital Product Passport'



1. “Old” Ecodesign Consultation Forum under the old Ecodesign Directive and “new” Ecodesign Forum under ESPR

The « old » Ecodesign Consultation Forum – Article 18 [Ecodesign Directive](#)

Under the « old » Ecodesign Directive

Article 18

Consultation Forum

The Commission shall ensure that, in the conduct of its activities, it observes, in respect of each implementing measure, a balanced participation of Member States' representatives and all interested parties concerned with the product or product group in question, such as industry, including SMEs and craft industry, trade unions, traders, retailers, importers, environmental protection groups and consumer organisations. These parties shall contribute, in particular, to defining and reviewing implementing measures, to examining the effectiveness of the established market surveillance mechanisms and to assessing voluntary agreements and other self-regulation measures. These parties shall meet in a Consultation Forum. The rules of procedure of the Forum shall be established by the Commission.

Webpage of the « old » Ecodesign Consultation Forum

Under the « old » Ecodesign Directive

Ecodesign and Energy Labelling Consultation Forum (X03609)

ACTIVE

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Details	Additional Information	Meetings	Subgroups	Members	Statistics
Abbreviation EELCF Lead DG - ENER - DG Energy - GROW - DG Internal Market, Industry, Entrepreneurship and SMEs Type - Formal - Permanent Mission To assist the Commission with the development and review of implementing measures and delegated acts pursuant respectively to Article 18 of Directive 2009/125/EC and Articles 12 and 16 of Regulation (EU) 2017/1369. The group shall also provide expert advice relevant for the implementation of this policy framework, inter alia by examining the effectiveness of the established market surveillance mechanisms, assessing self-regulation measures and working plans, and considering other relevant ecodesign and energy labelling matters. Legislative act Regulation (EU) 2017/1369 setting a framework for energy labelling, Art. 14 and Directive 2009/125/EC setting a framework of ecodesign requirements for energy-related products, Art. 18. Publication on the register of expert groups 07 May 2018 Contact ENER-ENERGY-LABELLING@ec.europa.eu Policy Area - Energy Associated DG - ENV - DG Environment Scope - Limited Task - Assist the Commission in relation to the implementation of existing Union legislation, programmes and policies - Assist the Commission in the preparation of delegated acts - Assist the Commission in the preparation of legislative proposals and policy initiatives Link to Website https://circabc.europa.eu/ui/group/418195ae-4919-45fa-a959-3b695c9aab28/library/a4df4a82-4e6d-4cbe-b137-9f529da177de Last updated 02 September 2024					

Members of the « old » [Ecodesign Consultation Forum](#)

Under the « old » Ecodesign Directive

Type C - Organisation (27)

Name of Organisation ↕	Category ↕	Countries/Areas represented	Membership Status ↕
APPLiA (Home Appliance Europe) (APPLiA)	Trade and business associations	European	Member
Association of the European Heating Industry (EHI)	Trade and business associations	European	Member
Bureau Européen des Unions de Consommateurs (BEUC)	NGOs	European	Member
DIGITALEUROPE (DE)	Trade and business associations	European	Member
EBU-UER (European Broadcasting Union)	Other Organisations	European	Member
Ecopreneur.eu European Sustainable Business Federation	NGOs	European	Member
Environmental Coalition on Standards (ECOS)	NGOs	European	Member
EUnited European Engineering Industries Association (EUnited)	Trade and business associations	European	Member
EURIC (EuRIC)	Trade and business associations	European	Member

Members of the « old » Ecodesign Consultation Forum

Under the « old » Ecodesign Directive

EUROCHAMBRES – Association of European Chambers of Commerce and Industry (eurochambres)	Trade and business associations	European	Member
EuroCommerce	Trade and business associations	European	Member
European Air Movement and Control Association (EU AMCA)	Trade and business associations	European	Member
European Committee of Air Handling and Refrigeration Equipment Industries (Eurovent)	Trade and business associations	European	Member
European Environmental Bureau (EEB)	NGOs	European	Member
European Partnership for Energy and the Environment (EPEE)	Trade and business associations	European	Member
European Ventilation Industry Association (EVIA)	Trade and business associations	European	Member
FEICA (FEICA)	Trade and business associations	European	Member
Independent Retail Europe (formerly UGAL - Union of Groups of Independent Retailers of Europe)	Trade and business associations	European	Member
International Association of Lighting Designers Europe (IALD Europe)	Professionals' Associations	European	Member

The « old » Ecodesign Consultation Forum

Under the « old » Ecodesign Directive

International Network for Sustainable Energy - Europe (INFORSE-Europe)	NGOs	European	Member
Japan Business Council in Europe (JBCE)	Trade and business associations	Japan	Member
LightingEurope (LE)	Trade and business associations	European	Member
ORGALIME – Europe's Technology Industries (ORGALIM)	Trade and business associations	European	Member
Pearle*-Live Performance Europe (Performing Arts Employers Associations League Europe) (PEARLE*)	Other Organisations	European	Member
Reuse and Recycling European Union Social Enterprises (RREUSE)	NGOs	European	Member
SEMI Europe GmbH (SEMIEU)	Trade and business associations	European	Member
Topten International Services (TIS)	Academia, Research Institute and Think Tanks	International	Member

Members of the « old » [Ecodesign Consultation Forum](#)

Under the « old » Ecodesign Directive

Type D - Member State Authority (27)

Country ⇅	Public Authorit(y-ies) ⇅	Membership Status ⇅
Austria	1 Public Authorit(y-ies)	Member
Belgium	1 Public Authorit(y-ies)	Member
Bulgaria	1 Public Authorit(y-ies)	Member
Croatia	1 Public Authorit(y-ies)	Member
Cyprus	1 Public Authorit(y-ies)	Member
Czech Republic	1 Public Authorit(y-ies)	Member
Denmark	1 Public Authorit(y-ies)	Member
Estonia	1 Public Authorit(y-ies)	Member
Finland	1 Public Authorit(y-ies)	Member
France	1 Public Authorit(y-ies)	Member
Germany	1 Public Authorit(y-ies)	Member
Greece	1 Public Authorit(y-ies)	Member

Members of the « old » Ecodesign Consultation Forum

Under the « old » Ecodesign Directive

Hungary	1 Public Authorit(y-ies)	Member
Ireland	1 Public Authorit(y-ies)	Member
Italy	1 Public Authorit(y-ies)	Member
Latvia	1 Public Authorit(y-ies)	Member
Lithuania	1 Public Authorit(y-ies)	Member
Luxembourg	1 Public Authorit(y-ies)	Member
Malta	1 Public Authorit(y-ies)	Member
Netherlands	1 Public Authorit(y-ies)	Member
Poland	1 Public Authorit(y-ies)	Member
Portugal	1 Public Authorit(y-ies)	Member
Romania	1 Public Authorit(y-ies)	Member
Slovakia	1 Public Authorit(y-ies)	Member
Slovenia	1 Public Authorit(y-ies)	Member
Spain	1 Public Authorit(y-ies)	Member
Sweden	1 Public Authorit(y-ies)	Member

Members of the « old » [Ecodesign Consultation Forum](#)

Under the « old » Ecodesign Directive

Type E - Other public entity (3)

Name of Organisation	Entity type	Countries/Areas represented	Membership Status
Icelandic Mission to the European Union - Iceland	Third Countries	Iceland	Member
Norwegian Water Resources and Energy Directorate (NVE) - Norway	Third Countries	Norway	Observer
Office of Economic Affairs - Lichtenstein	Third Countries	Liechtenstein	Member

Rules of the « old » Ecodesign Consultation Forum – Rules of procedure

Under the « old » Ecodesign Directive

RULES OF PROCEDURE OF THE ECODESIGN AND ENERGY LABELLING CONSULTATION FORUM EXPERT GROUP (X03609 - EELCF)

Point 7

Representation

1. In order to ensure a balanced participation of relevant stakeholders in respect to each discussed product group, the Chair may invite non-member representatives to discuss specific agenda items at certain meetings.
2. Each member of the group shall designate one person representing it at the group meetings and so inform the Chair. With the Chair's permission, the designated representatives may be accompanied by experts at the expense of the member. The members shall give prior notice to the Chair, at the latest two weeks before the meeting date, of the experts they wish to accompany their representatives. If the Chair does not object to the participation of the expert at the latest one week before the meeting date, the permission is considered to be granted.
3. A member may represent other members. The representing member shall provide evidence of the represented members' consent to the Chair in writing before the meeting.
4. Members shall ensure that the stakeholders they represent are duly informed of the discussions in the group.
5. Members shall ensure adequate consultation of the stakeholders when they represent and adopt representative opinions.

Rules of the « old » Ecodesign Consultation Forum – Rules of procedure

Under the « old » Ecodesign Directive

Point 7 bis

Invited experts

The Commission may invite experts with specific expertise with respect to a subject matter on the agenda to take part in the work of the group or sub-groups on an ad hoc basis.

Point 8

Observers

1. Organisations or public entities may be granted an observer status, in compliance with the horizontal rules, by direct invitation/as a result of a call for applications.
2. Organisations or public entities appointed as observers shall nominate their representatives.
3. Observers and their representatives may be permitted by the Chair to take part in the discussions of the group and provide expertise. However, they shall not participate in the formulation of recommendations or advice of the group.

My experience from the « old » Ecodesign Consultation Forum

Under the « old » Ecodesign Directive

- The European Lighting Industry is impacted by several ecodesign measures eg on light sources and separate control gears
- For specific meetings of the Ecodesign Consultation Forum on lighting products, LightingEurope was allowed to come to the meeting with several experts – from companies & national associations – members of LightingEurope. Request had to be sent in advance to the Commission and accepted by the Commission
- The earlier you provide input into the process the better!



The «new » Ecodesign Forum

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)



Ecodesign for Sustainable Products Regulation (ESPR)

Online Information Session

22 May 2024

New Ecodesign Forum & transition from the consultation forum



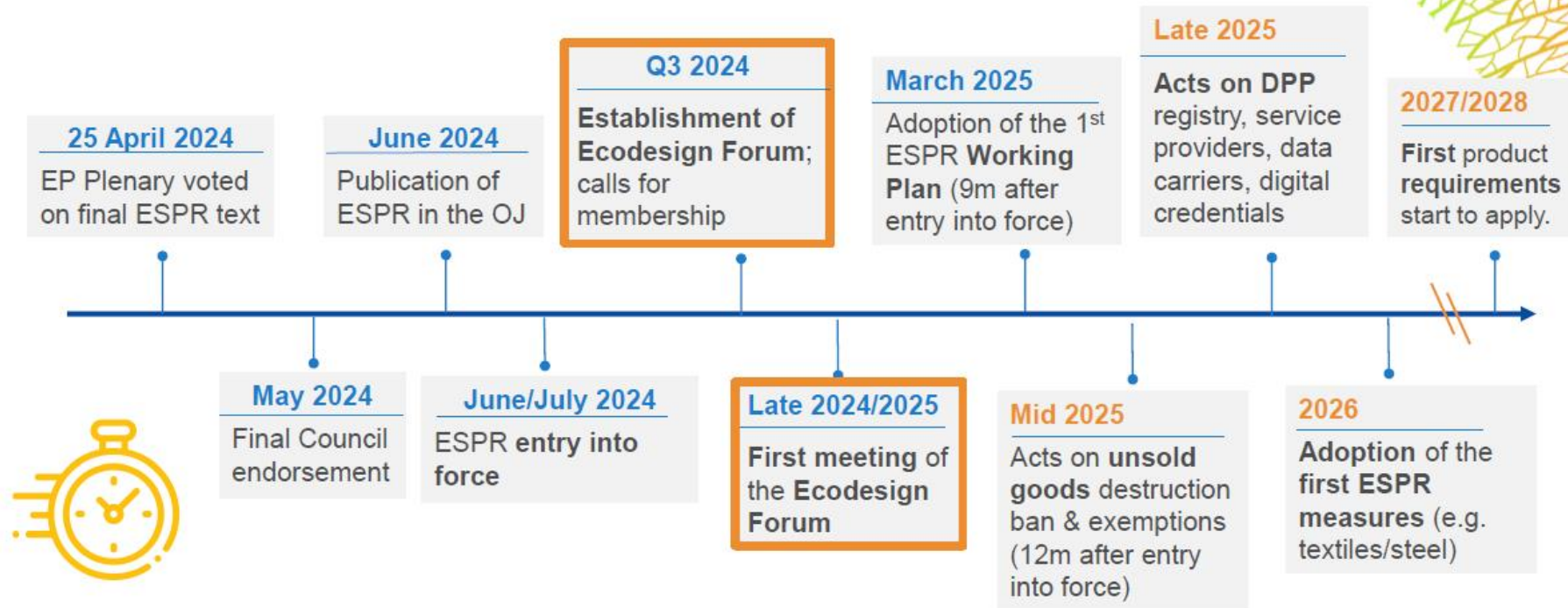
Yolanda Villar Ruberte
DG ENER



The «new » Ecodesign Forum

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

ESPR: tentative timeline & milestones



The «new » Ecodesign Forum

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

Ecodesign Forum (EDF) (I)

1. OBLIGATIONS on the Commission

Articles 5, 19, 20; Recital 52

- Establish an Ecodesign Forum in the form of a Commission expert group, with the aim of ensuring *'proper consultation of all interested parties'*.
- When preparing ecodesign requirements, *'take into account the views expressed by the Ecodesign Forum...and the Member States Expert Group'*.

2. MEMBERS of the Ecodesign Forum

Article 19; Recital 52

1. Experts designated by Member States; and
2. Other interested parties
→ such as *"representatives of industry, including SMEs and craft industry, social enterprises, trade unions, traders, retailers, importers, consumer and environmental organisations, actors involved in circular economy activities, European standardisation organisations, as well as researchers"*

The «new » Ecodesign Forum

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

Ecodesign Forum (II)

3. ROLE of the Ecodesign Forum

Article 19

The Ecodesign Forum shall contribute in particular to:

- (a) preparing **ecodesign requirements**;
- (b) preparing **working plans**;
- (c) examining the effectiveness of the established **market surveillance** mechanisms
- (d) assessing **self-regulation** measures
- (e) assessing prohibition of the **destruction** of unsold consumer products additional to those listed in Annex VII

4. MEMBER STATE Expert Group

Article 20; Recital 52

The Member State Expert Group will be a **subgroup** of the Ecodesign Forum, composed of **experts designated by Member States**, who shall contribute in particular to:

- (a) preparing **ecodesign requirements**;
- (b) assessing **self-regulation** measures;
- (c) exchanging information and best practices on measures to enhance **compliance** with this Regulation;
- (d) setting priorities under Article 26 (Consolidated information on the destruction of unsold consumer products)

The «new » Ecodesign Forum

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

Establishment of the EDF (I)

Adoption of a Commission Decision legally establishing the Ecodesign Forum:

- As soon as possible following ESPR's entry into force (likely Q3 2024)
- Will include horizontal rules governing the Forum (e.g. role, selection of members, operation, transparency, etc.)

Call for membership applications:

- **For non-Member State participants:** Call to be published on the Register of Commission Expert Groups* (likely Q3 2024)

* <https://ec.europa.eu/transparency/expert-groups-register/screen/home?lang=en>

- **For Member State participants:** Nominations to be requested directly

The «new » Ecodesign Forum

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

Establishment of the EDF (II)

Meetings:

- Rules of procedures (RoP) to be drawn up in advance and adopted at first meeting of the Forum
- Documents (e.g. invite, agenda, drafts) to be sent in advance of meetings, within deadlines set out in RoP
- First meeting of the Ecodesign Forum: early 2025 (TBC)



The «new » Ecodesign Forum

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

General principles governing the Ecodesign Forum

Some initial reflections:

- Maintain an **open** public call for membership applications (with possible 'rounds of selection' depending on the products/ horizontal requirements covered by the subsequent Working plans);
- Design **membership criteria** to ensure, as far as possible, "a high level of expertise, a geographical balance, as well as a balanced representation of relevant know how and areas of interest" (C(2016) 3301 final);
- **5 years renewable**;
- **Hybrid meetings** as default.

The «new » Ecodesign Forum

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

Coexistence CF-ED Forum until 2030

ED EL Consultation Forum

By vertu of the transitional mechanism the current ED EL Consultation Forum will continue to be consulted on energy-related products:

- for which work is already substantially advanced so as to get the necessary 2009/125 measures adopted **until end of 2026**;
- **In case** existing 2009/125 measures need some “technical corrections”, they could be adopted **until end of 2030**.

Ecodesign Forum

The Ecodesign Forum, also dealing with EL, will be consulted on products/horizontal requirements identified in the ESPR working plans either as:

- ‘**New**’ products (i.e. those outside the scope of the current Ecodesign Directive)
- **Or energy-related products** except those under the transition mechanism for which work is in progress.

**These include: photovoltaic panels, space and combination heaters, water heaters, solid fuel local space heaters, air conditioners including air-to-air heat pumps and comfort fans, solid fuel boilers, air heating and cooling products, ventilation units, vacuum cleaners, cooking appliances, water pumps, industrial fans, circulators, external power supplies, computers, servers and data storage products, power transformers, professional refrigeration, and imaging equipment*

The «new » Ecodesign Forum

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

ESPR transitional regime

- Existing measures adopted pursuant to Ecodesign Directive remain in force until repealed;
- Transitional provisions (Article 79):
 - Ongoing work on 19 energy-related product groups can continue until end of 2026
 - Amendments to existing energy related product regulations can also be adopted under Ecodesign Directive till 2030, with a view to “keep them fit for purpose” ”;
 - Legal base for continuing progress / keeping these measures “fit” is Ecodesign Directive
 - ED -EL consultation forum remains in place + Comitology procedure applies

The «new » Ecodesign Forum

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

Pending work under the EDEL WP 2022-24

► Transitional regime

Industrial fans	Cooking appliances
Space and combination heaters	Professional refrigeration equipment
Water heaters	Power transformers
External power supplies	Imaging equipment
Photovoltaic panels	Circulators
Water pumps	Air heating / cooling products
Air conditioners inc. A-A HPs	Ventilation units
Vacuum cleaners	Computers
Solid fuel local space heaters	Servers and data storage products
Solid fuel boilers	

► ESPR WP

Electronic displays
Light sources and separate control gear
Welding equipment
Electric motors and variable speed drives
Household dishwashers
Household washing machines and washer-dryers
Refrigerating appliances (household)
Refrigerating appliances with sales function
EV charging boxes
Professional laundry
Professional dishwashers

60 The «new » Ecodesign Forum

Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

4.1. Establishment & Membership

23. *What is the Ecodesign Forum?*

As was the case under the Ecodesign Directive (2009/125), the Commission will work closely with a wide range of relevant stakeholders, including Member States, in order to gather expertise and advice in the implementation of ESPR. The subjects on which the Forum will be called to provide its views are set out in Articles 19 and 20 of ESPR and include the development of ecodesign requirements and working plans as well as questions in the area of market surveillance, self-regulation and destruction of unsold consumer products. In the same vein, the Ecodesign Forum will also have an advisory role in the implementation of energy labelling rules, in keeping with Article 14 of the Energy Labelling Regulation (EU) 2017/1369. Certain members will be selected via a call for applications, while others will be invited directly by the Commission (see more information below).



61 The «new » Ecodesign Forum

Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

24. *Who can join the Ecodesign Forum, and how can they apply for membership?*

Membership of the Ecodesign Forum will be open to a wide range of stakeholders. Examples include (but are not limited to): *experts designated by Member States; industry representatives, including from SMEs and craft industry; social enterprises; trade unions; traders, retailers and importers; consumer and environmental organisations; actors involved in circular economy activities; European standardisation organisations; and researchers.*

All members will need to fall into one of the following categories: *individuals appointed to represent a common interest (type 'B' members); organisations (type 'C' members); Member State authorities (type 'D' members); or other public entities (type 'E' members).* Please see further details on these member-categories [here](#).



62 The «new » Ecodesign Forum Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

Members from the 'B' and 'C' categories (i.e. *individuals appointed to represent a common interest and organisations*) will be selected based on a **public call for applications**. This call will be published on the [Register of Commission Expert Groups](#) (and through other means, such as the ESPR webpage), as soon as possible after the Forum has been established. The call will clearly outline the selection criteria, including the required expertise and the interests to be represented in relation to the work to be performed. Applicants will be requested to complete relevant application forms and submit them to the Commission for examination, along with other supporting documentation (exact details will be set out in the call). As for all types 'B' and 'C' members, registration in the [Transparency Register](#) will be a pre-requisite for appointment as members (see Article 8 of the [Horizontal Rules on Commission Expert Groups](#)).



⁶³The «new » Ecodesign Forum Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

Members of type D and E (*Member State authorities and other public entities*) will be appointed directly by the Commission. While they will appoint their representatives in the group, those individuals will not be members and will not express their personal views: they will represent the member and express the positions/views of that member.

In addition to members, the Commission may also decide to appoint ‘observers’ of the Ecodesign Forum. Registration in the Transparency Register is not a prerequisite for appointment as observer.



64 The «new » Ecodesign Forum Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

25. *What will the membership criteria be and how will members be selected?*

The Commission is currently preparing the call for applications for membership of the Ecodesign Forum. This call will apply to type 'B' and 'C' applicants only (see above), and will be published as soon as possible once the Forum has been established, on the [Register of Commission Expert Groups](#) (and through other means, such as the ESPR webpage). This call will set out the detailed membership criteria that type 'B' and 'C' applicants will need to meet in order to gain membership of the Forum.

Such criteria may include (but will not be limited to): proven and relevant competence and experience, including at EU level, in areas relevant to the work of the Forum; absence of conflicts of interest; proven capacity to effectively represent positions shared by stakeholders; proven experience/expertise in domains relevant to the Forum, etc.



65 The «new » Ecodesign Forum

Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

Type 'B' and 'C' applicants will likely be required to submit a completed selection criteria form along with their application, as well as a cover letter explaining their motivation for applying for membership of the Forum and describing what contribution they could make to its activities. They will then be assessed against the selection criteria that will be set out in the call. Once this is completed, a list of the most suitable type 'B' and 'C' applicants will be established and members of the Forum will be appointed. Applicants which do not meet the selection criteria in full may in certain cases be granted observer status in the Forum.

When carrying out its selection process, the Commission will reserve the right to grant or withhold membership or observer status as it deems fit, in line with the selection criteria, including in the interest of ensuring a 'balanced and effective' participation of stakeholders, as required under the ESPR text.



⁶⁶The «new » Ecodesign Forum Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

26. When and where will the call for applications for membership of the Ecodesign Forum be published?

As soon as possible after the Commission Decision establishing the Ecodesign Forum has been adopted. This is likely to be in Q3 2024. It will be published on the [Register of Commission Expert Groups](#) (and through other means, such as the ESPR webpage).



67 The «new » Ecodesign Forum

Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

27. Will individual companies/industry representatives be eligible to be members, or must they join via professional associations?

A final decision on membership criteria has yet to be taken and full details will be published in the call for applications. Given the very wide range of stakeholders that the Ecodesign Forum will be required to gather, the possibility of restricting full membership to organisations with proven capacity to effectively represent the position shared by stakeholders – i.e. representative associations/umbrella organisations – has not been excluded.

In all cases, stakeholders interested in following the work of the Ecodesign Forum are encouraged to contact relevant representative organisation(s) at EU level.



68 The «new » Ecodesign Forum Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

28. Will stakeholders be able to join the Ecodesign Forum at a later stage, depending on the product categories for which requirements are being considered/developed?

Yes. The current intention is to maintain a **continuously open call for applications**, meaning that, at any relevant moment, stakeholders of types 'B' and 'C' (see above) will be able to apply for membership of the Ecodesign Forum, and the Commission services will take their application into account when additional expertise is needed.

It should nevertheless be noted that, following a first round of applications for membership of the Forum (a deadline for which will be communicated in the call for applications to be published), the Commission may 'phase' the examination of subsequent applications, in line with the needs for expertise that arise.



69 The «new » Ecodesign Forum

Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

29. Can SMEs be part of the Ecodesign Forum and if so who should they contact?

Yes, the ESPR text makes clear that SMEs should participate in the Ecodesign Forum. As already mentioned however, while final membership criteria will be published together with the call for applications, in the interest of ensuring balanced and effective participation in the Forum, the Commission may decide to restrict full membership to organisations with proven capacity to effectively represent the position shared by stakeholders. In the case of SMEs, this would mean associations representing SME interests (i.e. membership-based organisations).

SMEs interested in following the work of the Ecodesign Forum are in all cases encouraged to contact the relevant representative organisations at EU level.

The Commission is currently looking into possibilities to provide support to SME representatives, especially those of microenterprises, to enable their effective participation in the Ecodesign Forum.



⁷⁰The «new » Ecodesign Forum

Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

30. Do members of the Ecodesign Forum need to be EU-based?

As required under Article 19 of the ESPR, the Commission will strive to ensure balanced and effective participation of all relevant parties in the Ecodesign Forum. This could include non-EU-based parties. Applications to join the Forum will be examined on a case-by-case basis. While the Commission may reserve the right to restrict full membership status to EU-based stakeholders, a decision to grant observer status to non-EU-based organisations or individuals may in such cases be taken. As for all type B and C members, registration in the [Transparency Register](#) will be a pre-requisite for appointment as members (see Article 8 of the [Horizontal Rules on Commission Expert Groups](#)). Please note that registration in the Transparency Register is not necessary for appointment as observer.

The Commission may nevertheless decide to grant full membership to non-EU-based authorities, organisations or individuals, where it considers that the advice and expertise provided to the Commission would not be complete without their full participation in the Forum.



⁷¹The «new » Ecodesign Forum

Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

32. Will there be only one Ecodesign Forum or will there be product-specific sub-groups?

While the only sub-group currently foreseen is the Member State sub-group required under Article 20 ESPR, the Commission may in the future decide to establish additional sub-groups for the purpose of examining specific questions or subject matters.

Meetings dedicated to specific products and/or workstreams are nevertheless anticipated. For these meetings, attendance of stakeholders with most direct interest in the sector(s) in question will be prioritised.



⁷²The «new » Ecodesign Forum Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

33. How will the Commission ensure that the perspectives of all those affected across the supply chain (including outside the EU) are heard in the Ecodesign forum?

As the ESPR text sets out, the Commission will be obliged to ensure balanced and effective participation in the Forum of all parties having an interest in the relevant product(s)/product group(s) being worked on.

The selection criteria, to be set out in the call for applications, will therefore be designed with the aim of ensuring that all key stakeholders (including those from outside the EU) are well represented in the Forum – whether as full members or observers.



73 The «new » Ecodesign Forum

Extracts of new Commission [FAQ](#) on ESPR

Under the « new » Ecodesign for Sustainable Products Regulation (ESPR)

34. Will the Ecodesign Forum be consulted during the development of preliminary studies & impact assessments, or only at a later stage?

The Commission will gather the necessary expertise and advice via specific consultations of the Forum when preparing ecodesign requirements. It may therefore choose to consult the Forum during the development of preliminary or review studies, evaluations and impact assessments, and/or at a later stage, when preparing the rules themselves. This will be decided on a case-by-case basis.



2. ESPR preparatory study on iron & steel products

Ongoing ESPR Preparatory Study on Iron and Steel Products

Objective

The **preparatory study** aims to deliver an in-depth exploration of the environmental and techno-economic aspects of iron and steel products, producing scientific evidence to support future discussion on EU product policies and lay the ground for a possible future **Delegated Act** for iron and steel products.

Expected results:

-  Identification of measures with the highest improvement potential
-  Proposal for scope of data for Digital Product Passport



You can register as a stakeholder here
[Register | Product Bureau](#)
europa.eu

ESPR Delegated Act on Iron & Steel

ESPR Preparatory study – Iron and Steel Products

- The Commission's DG GROW (lead) and JRC started in the preparatory study for new Ecodesign requirements for iron and steel products which aims to provide environmental and techno-economic background to support future discussions on EU product policies with scientific evidence (in line with ESPR proposal). EUROFER is going to provide all necessary inputs.
- Since steel is an intermediate product, the preparatory study will follow a cradle-to-gate approach, covering the analysis from the extraction of raw materials (iron ore, coal, etc.) to the factory gate. Therefore, the study will consider different intermediate products derived from the different stages of the steelmaking process, inter alia, crude steel, semi-finished products and finished products.
- As a results, it will identify a set of suitable requirements (both performance and information) applicable to the products concerned (iron and crude steel, semi-finished and finished products of steel), laying the ground for a possible future Delegated Act on ESPR.
- Stakeholder involvement is crucial to this study for data collection and joint analysis.



Source: The EU Commission

ESPR Delegated Act on Iron & Steel

ESPR Preparatory study – Iron and Steel Products

The preparatory study for new Ecodesign requirements for iron and steel products:

The Study will address the following tasks, in accordance with a tailor-made methodology that brings together existing best practices in the area of technology assessment, life cycle assessment and multi-criteria analysis.

- Task 1 – Scope (28/09/2023-22/10/2023)
 - Task 2 – Market Research (07/12/2023 – end of April 2024)
 - Task 3 – Technical Analysis (launched -
 - Task 4 – Environmental & Economic Assessment (launched
 - Task 5 – Design Options
 - Task 6 – Policy Analysis and Scenarios
 - Task 7 – Development of Criteria
 - Task 8 – Digital Product Passport related work
- Online workshop on 25 June 2024
- Online workshop expected in February 2025
- Drafting of Delegated act; may start from June 2025

Task 3: Technical Analysis

- Material Flow Analysis of steel + scrap in the EU
- Representative Products (RP) based on several criteria
- Development of Bill of Materials for the selected RP
- BAT
- BNAT

Task 4: Base Case, LCA & LCC

- Set up of an LCA model of the steelmaking process considering:
 - both BF-BOF and EAF routes
 - recycled content (scraps)
 - parallel work with Task 3 on the BoM
 - data inventory collection: primary data, existing datasets

ESPR Delegated Act on Iron & Steel

Selection of representative products

17-Oct-24

Takeaways from RPs selection

A comprehensive assessment was carried out to identify the best representative products

- Hot rolled coil, Galvanised Cold rolled coil and wire rod together represent around **40%** of both total EU consumption & production
- **Stainless steel:** Compared to other categories, the more limited EU production leads to a substantial **import reliance**.
In terms of volume, its associated **CO₂ consumption footprint** is of the same order of magnitude as the most consumed products.
- **Electrical steel sheets:** Though having lower production and consumption than others, its **strategic importance** for sectors like e-mobility and wind turbines, **high import reliance**, and **forecasted increase of the consumption** justify its inclusion as a representative product.

Final RPs List:

- ❖ Hot rolled coil
- ❖ Rod & wire rod
- ❖ Galvanised cold rolled coil
- ❖ Stainless steel
- ❖ Electrical sheet



Orgalim general comments submitted to the JRC in August 2024

Hereby we would like to provide the following **general comments**.

A meaningful exchange of information between the different actors in the value chain will improve the product life cycle footprint, from design to recycling and therefore contribute to a circular economy. Responsibilities to provide data must be shared between the different actors in the value chain, so that the burden of providing the data is not only on the manufacturer. **We therefore welcome that data will be requested from manufacturers of intermediate products**, such as steel and iron, as it will help our industries to access data from these manufacturers.

In addition, we believe that our industries will be affected by these intermediate products as:

- Users of the above-mentioned intermediate products for manufacturing our technologies/products
- Providers of equipment which further process and recycle intermediate products

When setting ESPR requirements for intermediate products, it is **very important for the competitiveness of our industries to avoid unnecessary and burdensome duplication of efforts, double regulation** both at horizontal and product levels, **and to ensure consistency** with other legislation.

Orgalim general comments submitted to the JRC on 26 August

For instance, we foresee a **possible double regulation** for intermediate products, such as the following examples:

- Steel and aluminium which are already covered for example by the EU Emissions Trading System (ETS) and the Carbon Border Adjustment Mechanism (CBAM).
 - The distinction and potential overlap between CBAM and iron and steel products under ESPR is not evident to us. Here is a concrete example. While coherence with the CBAM regulation is desirable, it is not clear that the categories used by the Combined Nomenclature (CN) are appropriate for clustering of products for the purpose of this preparatory study under ESPR. This is confirmed by the following finding 3 of the takeaways from task 1 of the preparatory study which was presented during the stakeholders's workshop on 25 June *"While coherence with the CBAM is desirable, the categories used by the Combined Nomenclature are not suitable for clustering products for the purposed of this preparatory study"*. Product quality, use of alloy elements and energy requirements during different treatment process in steelmaking are not totally captured by the CN categories, but influence on the specific emissions associated to the products. This means that for the same intermediate products we could have different designation/nomenclature under CBAM and ESPR. Looking from the supply-chain and user of steel perspective, this could lead to a lot of confusion and administrative burden when implementing it.
 - The proposed requirements on carbon footprint of steel seem to be a double regulation with ETS.

Orgalim general comments submitted to the JRC on 26 August

- **Chemicals** which are already regulated under the REACH Regulation and RoHS Directive. As chemicals are already regulated in other chemicals legislation (REACH and RoHS), chemicals should not be further regulated under the ESPR. We fully support the approach of the European Commission to avoid ESPR restricting substances based on chemical safety as it is already done under other Union chemicals legislation, and focus on performance and sustainability instead. However, it should only be carried when justified and relevant.
- **Plastics** which are already regulated, for example in the new Packaging and Packaging Waste Regulation.

The **added value for the environment and sustainability** must be made clearer (e.g. a “green/sustainable” steel can be used in an inefficient non-sustainable product).

There is a strong demand from our industries for the Commission and the Joint Research Center conducting the preparatory study on iron and steel products to first define, based on a comprehensive impact assessment, **how regulating intermediate products such as steel and iron would work in practice under the ESPR and what kind of obligations** the user and/or processor of the intermediate product would have **related to the Digital Product Passport (DPP)** as the DPP is supposed to apply to the product over its life cycle.

We thank you for considering our views. Please do not hesitate to contact Orgalim (stephanie.mittelham@orgalim.eu) should you require additional information.

Highlights from recent Orgalim Green Transition WG meeting with EUROFER held on 12 September 2024

17-Oct-24



- Orgalim position one year ago was that we are not in favour of regulating intermediate products under ESPR.
- EUROFER members will have to deliver lots of data because all Orgalim members are using iron and steel in their production. So Orgalim members will be asking EUROFER members about these data.
- EUROFER members are quite supportive to regulate intermediate products under ESPR
- EUROFER members are also supportive of having performance requirements on steel. Maybe it could be just information requirements to begin with.
- Expectation from EUROFER is that the ESPR information requirements will be on the steel producers and not on SMEs that are using steel
- What data will be asked in the DPP is not clear yet.
- New possible position from Orgalim could be that we support having information requirements for intermediate products but performance requirements are not appropriate.

ESPR preparatory study on textiles

ESPR preparatory study on textiles



Product Bureau

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Textile products



Welcome to the home page of the Preparatory Study on Textile Products.

In order to support the fulfilment of these commitments, the European Commission has launched a preparatory study by the Commission's Joint Research Centre. This preparatory study aims to provide a basis on which the Commission can consider the introduction of ecodesign requirements, green public procurement criteria and revised EU Ecolabel criteria for textile products. These instruments will be considered in parallel to ensure maximum synergy and complementarity. The JRC will carry out research in line with the proposed Ecodesign for Sustainable Product Regulation, following the structure prescribed by the Methodology for Ecodesign of Energy-related Products (MEERp). This methodology will be adapted where appropriate to adequately consider the relevant product sustainability aspects of textiles. The project will also analyze information in accordance with the [EU Ecolabel Regulation 66/2010](#).

The JRC will invite registered stakeholders to express their views and to provide comments on draft deliverables of the preparatory study in writing and during three technical working groups. Interested stakeholders are encouraged to register by leaving their contact information via this link:

<https://susproc.jrc.ec.europa.eu/product-bureau//contact/register>.

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ESPR preparatory study on textiles

Milestone	Topic addressed	Date
Initial questionnaire	Definitions, Scope, Market analysis, User Behaviour, Ecodesign aspects, EU Ecolabel, EU Green Public Procurement	30 March 2023 – 8 May 2023
1 st milestone	Scope, market, user behaviour, current EU Ecolabel criteria, current EU Green Public Procurement criteria	23 February 2024 – 22 April 2024
2 nd milestone	Technologies, and analysis of base-cases from environmental and economic perspectives	To be communicated
3 rd milestone	Analysis of ecodesign aspects, design options, policy scenarios, and elements to be included in the digital product passport	To be communicated

ESPR preparatory study on textiles

For each milestone, the stakeholder consultation will include the following steps:

1. The JRC will communicate by email to all registered stakeholders the time and steps of the specific consultation. In the same email, the JRC will provide the working document(s) related to the milestone. All documents will be uploaded on the [specific section](#).
2. Registered stakeholders will read the working document(s) before the on-line consultation meeting.
3. The JRC and registered stakeholders will attend the on-line consultation meeting. In this meeting, registered stakeholders will be able to openly discuss with the JRC and among themselves.
4. Registered stakeholders will provide comments to the working document(s).
5. On a [specific section](#), the JRC will publish a document containing anonymised written comments submitted by the registered stakeholders with the corresponding answer by the JRC.

The suitable time will be given to each step of the stakeholder consultation.

3. EU funded project CIRPASS-2 on Digital Product Passports

CIRPASS-2 project

CIRPASS-2 Objectives

1. Deploy and validate at scale and in real-life setting Digital Product Passports in four target value chains
 - 13 pilots
 - All pilots focus on B2B activities that promote circularity
 - Support the ongoing CEN/CENELEC standardisation work (JTC-24)
2. Demonstrate cross-pilot interoperability
3. Provide support to SMEs in their uptake of DPPs while supporting the deployment of a diverse and vibrant DPP-as-a-Service solution provider community
4. Support the deployment and adoption of DPPs by other sectors targeted by upcoming European regulations and beyond

CIRPASS-2: Summary

- Call: DIGITAL-2023-CLOUD-DATA-04 -DIGIPASS - Digital Product Passport
- EU Agency: HaDEA
- Budget : 12,558 million euros (50% funding rate. 6 million euros requested funding)
- Type of project: Innovation Action
- Coordination : CEA
- Number of Partners : 49 (beneficiaries, affiliated entities, associated partners)
- Project duration : May 2024 – April 2027



CIRPASS-2 project



What is a Digital Product Passport (DPP) and why is it relevant for companies selling directly or indirectly as suppliers to the EU market?

maki consulting
Life cycle expert services

A Digital Product Passport (DPP) is a dynamic, interoperable online record that centrally aggregates and shares comprehensive product data — including technical specifications, lifecycle environmental impacts, compliance documentation, and traceability information — accessible via data carriers like QR codes or RFID to support transparency, circular economy practices, and accountability throughout the product's lifecycle.

Capability: The DPP uniquely combines functionalities of multiple tools (e.g. PIM, MRP II, ERP, ...), and integrates metrics/labels (e.g. BOM, MSDS, EPD/LCA/PEF, environmental and social labels, ...) offering a holistic view that individual systems cannot provide alone.

Dynamic and Collaborative Platform: Unlike static documents or isolated systems, the DPP enables on product item level also continuous updates and collaboration among stakeholders.

Support for Circular Economy and Sustainability: By integrating data on recyclability, recycled content, and environmental impacts, the DPP actively supports sustainable practices.

Regulatory and Compliance Advantage: Centralizing compliance information reduces the burden of regulatory reporting and ensures up-to-date adherence to legislation.

Innovation Enablement: Provides comprehensive insights that drive product improvements and innovation.



End-to-End Traceability: Tracks products and materials throughout their entire lifecycle, aiding in quality control and

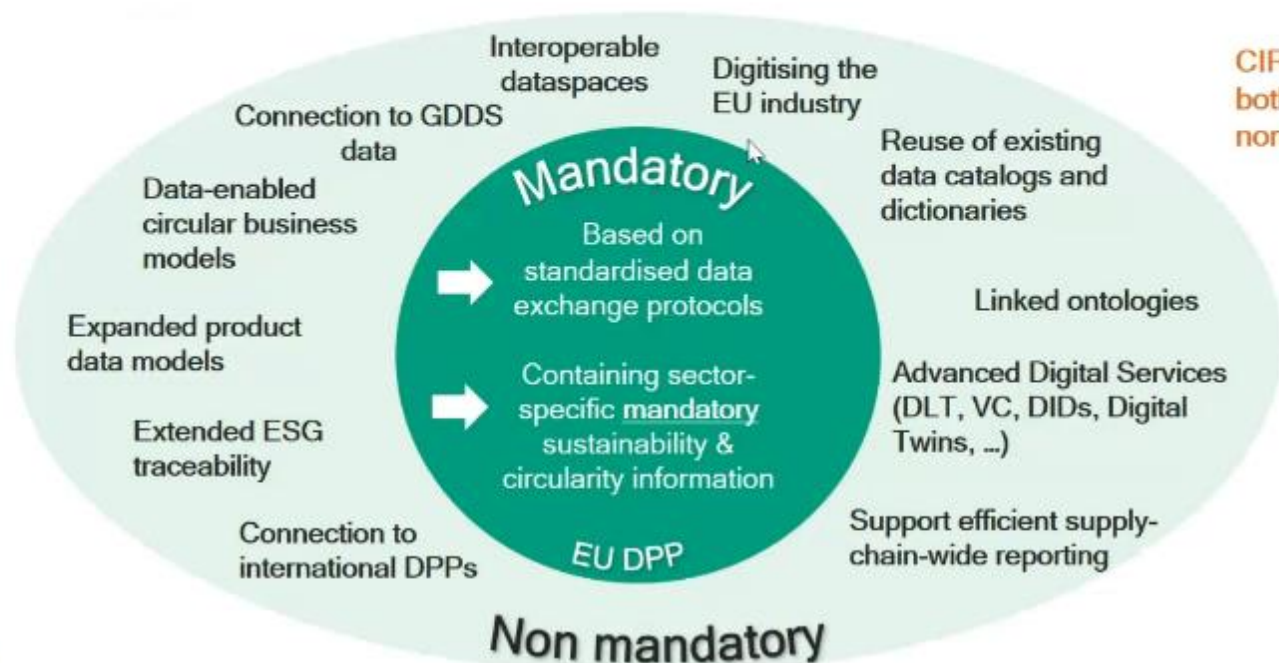
CIRPASS-2 project



Why is the DPP System an incredible opportunity?



- **Vision:** The DPP links the EU internal market to the data economy.



CIRPASS-2 addresses both mandatory and non-mandatory DPPs

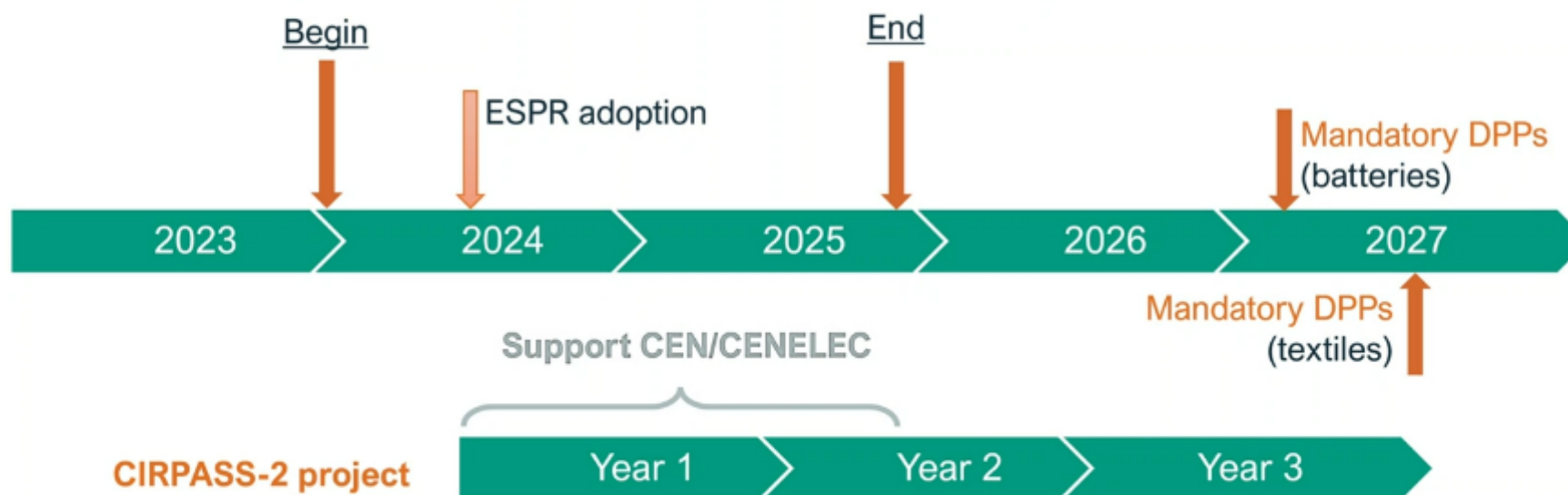
CIRPASS-2 project



DPP System Standardisation - Timeline



Standardisation Request – DPP System standards CEN/CENELEC JTC-24



CIRPASS-2 project



Project status – September 2024



Project web site active and being populated with new content on a weekly basis: www.cirpass2.eu

Lighthouse pilot presentation videos

EWG/CoP partners are welcome to share useful information of general interest (no opinions, please!) : <https://cirpass2.eu/other-useful-publications/>



Submission to CEN/CENELEC JTC24 of standardisation liaison request.



Revision of "DPP User Stories V2" from <https://cirpassproject.eu/project-results/>

DPP User Stories describe actor interactions with the DPP System.

Following feedback from EC and partners.
Publication of V3 towards mid-October.

CIRPASS-2 project

CIRPASS-2 consortium partners



- **White:** CIRPASS partner
- **Yellow:** new partner in Cirpass-2

<https://cirpass2.eu/who-we-are/>

- **This list does not include :**
 - Pilot ecosystem partners
 - Expert working group (EWG) and Community of Practice (CoP) partners

Funded by
UDGAL Shailendra | Bio Innovation (External)



1	CEA	France
2	TALLINNA TEHNIKAÜLIKOO	Estonia
3	Mindworks Industries OU	Estonia
4	DIGITALEUROPE AISBL*	Belgium
5	E CIRCULAR APS	Denmark
6	F6S NETWORK IRELAND LIMITED	Ireland
7	DIN	Germany
8	VDE VERBAND DER ELEKTROTECHNIK ELEKTRONIK INFORMATIONSTECHNIK EV	Germany
9	Global Textile Scheme	Germany
10	maki Consulting GmbH	Germany
11	Ekodenge Ltd	Turkey
12	STIFTELSEN CHALMERS INDUSTRIETEKNIK	Sweden
13	Netherlands association of applied scientific research	Netherlands
14	BioInnovationService	France
15	TECHNISCHE UNIVERSITEIT DELFT NL	Netherlands
16	Energy Web AG	Switzerland
17	ASOCIACION DE EMPRESAS TECNOLOGICAS INNOVALIA	Spain
18	CBT COMUNICACION Y MULTIMEDIA SL	Spain
19	ASOCIACION PARA DESARROLLO DE LA ECONOMIA DEL DATO	Spain
20	GS1 IN EUROPE	Belgium
21	AOC Innovation	France
22	+IMPAKT LUXEMBOURG SARL	Luxembourg
23	Platform Industry 4.0 Austria	Austria
24	Fujitsu	Belgium
25	Fraunhofer IZM	Germany
26	Extra Red	Italy
27	Euratex	Belgium
28	Worldline	France
29	Physikalisch-Technische Bundesanstalt	Germany
30	Ioxio Oy	Finland
31	Suomen Tekstiili ja Muoti ry (Finnish Textile and Fashion)	Finland
32	Kezzler	Norway
33	EON	Hungary
34	Avery Dennison Atma GmbH	Austria
35	CIRCULAR.FASHION UG (HAFTUNGSBESCHRANKT)	Germany
36	Tripler	Belgium
37	Scantrust	Netherlands
38	Arcelik A.S	Turkey
39	Digital Data Chain Consortium GbR	Germany
40	ZVEI	Germany
41	Whatt.io	Sweden
42	ASCDI	USA
43	OBADA Foundation	USA
44	Gorenje gospodinjiski aparati, d.o.o	Slovenia
45	Hisense Gorenje Europe, d.o.o.	Slovenia
46	Michelin	France
47	Cobuilder AS	Norway
48	Global Electronics Council	USA
49	Textile Exchange	USA
50	IPOINT-SYSTEMS GMBH	Germany



**Austrian
Platform
Industrie
4.0 is a
member of
CIRPASS-2**

**INDUSTRIE 4.0
ÖSTERREICH**

CIRPASS-2 project



Experts Working Groups and Community of Practice

EWG1	EWG2	EWG3	EWG4	EWG5
Observatory Board	Standardization Liaisons	Textile Stakeholders	Electronics Stakeholders	Other Stakeholders
Monitor DPPs-related policy	Monitor and report on standardisations activities to ensure interoperability	Bring insights on the sector, its value and supply chains to clarify benefits and challenges, validating new business models	Bring insights on the sector, its value and supply chains to clarify benefits and challenges, validating new business models	This group will explore the characteristics of other value chains and sectors that might be affected by DPP
Moderator: Shaileendra Mudgal (BioIS)	Moderator: Jens Gayko (VDE) and Benjamin Helfritz (DIN)	Moderator: Andreas Schneider (GTS)	Moderator: Chiara Sandionigi (CEA)	Moderator: Marc-Andree Wolf (maki)

Community of Practice

This group of experts aims to involve PLM / ERP / PIM software vendors in the design and deployment of the DPP system to ensure interoperability across different technologies. The CoP will be limited to 100 participant entities.

Moderator: Valeria Muggianu (DE)

Orgalim joined the EWG1, EWG4 and EWG5

CIRPASS-2 project



Governance objectives



The Expert Working Groups (EWGs) and the Community of Practice (CoP) are pivotal to the CIRPASS-2 project, providing a structured platform for diverse key stakeholders and experts to contribute their expertise and insights. These groups aim to:

- Support the implementation of DPPs by leveraging **industry-specific knowledge** and cross-sectoral collaboration.
- **Disseminate** DPP knowledge and expertise beyond the reach of CIRPASS-2.
- **Ensure future compliance, interoperability and adoption of standards** through consistent monitoring of regulatory and standardisation developments.
- **Facilitate knowledge sharing among stakeholders**, enhancing the collective understanding of challenges and opportunities in DPP deployment.
- **Promote Innovation and Sustainability by exploring new business models** and sustainable practices.

CIRPASS-2 project

Highlights from EWG1 kick off meeting on 25 September



EWG1 short description



EWG1 – Customisation and Deployment of DPPs in Other Sectors

This group's objective is the monitoring of DPP-related policies and regulations, European and beyond, as well as other regulatory developments that can affect DPP implementation and assessment (circularity measurements, sustainability, material safety).

EWG1 will support the following tasks

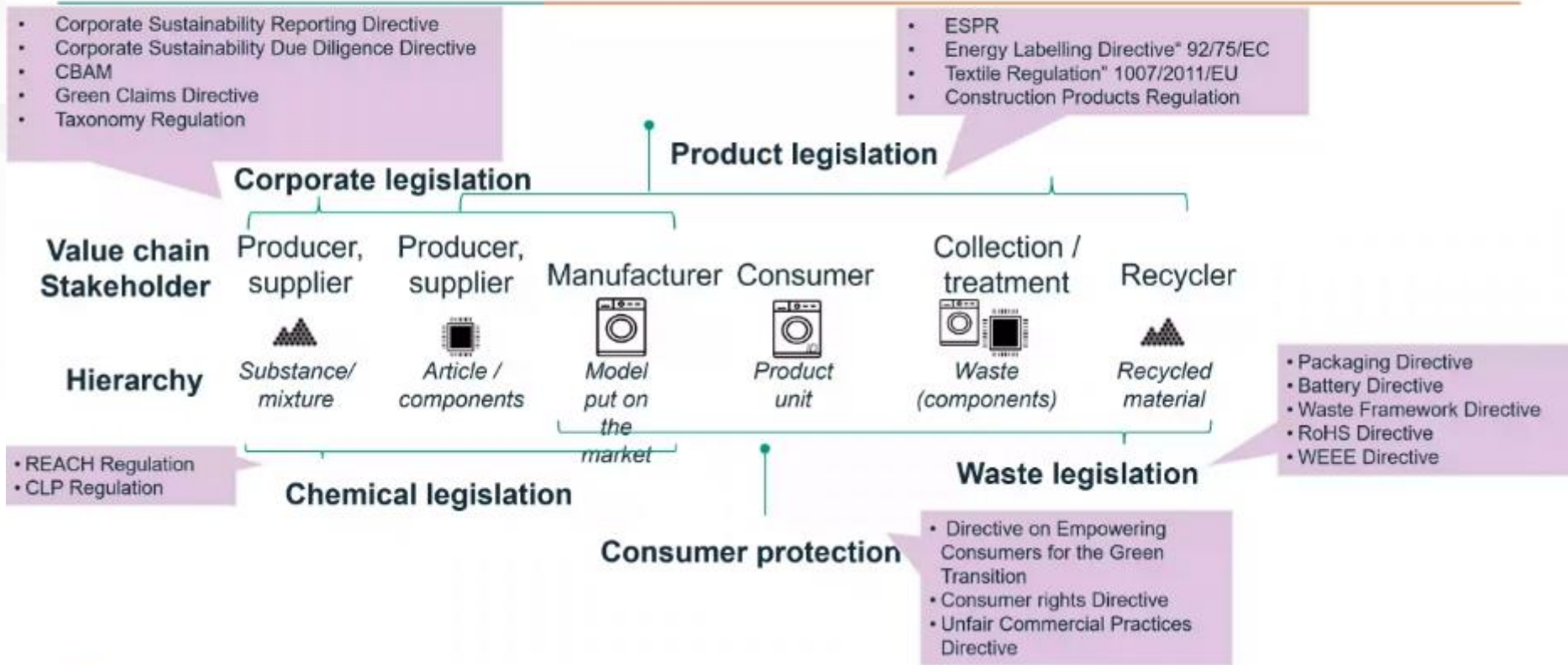
- T1.3 (partnerships coordination)
- T5.1 (challenges and opportunities for SMEs in keeping up with the regulatory context) and
- T6.4 (evaluate DPP benefits and challenges on environmental, circularity, economic and policy dimensions).
- Global scope
- Around 118 applicants so far
- The 100 organisation seats will be filled by applicants that send back the signed MoU to the contacts at Digital Europe.
- **!** You will be an official member of EWG1 (and potentially other suitable EWGs and/or the CoP) only after you have received back the counter-signed MoU from the project coordinator.

CIRPASS-2 project

Highlights from EWG1 kick off meeting on 25 September



A wide array of policies



CIRPASS-2 project

Highlights from EWG1 kick off meeting on 25 September



Other specific activities for EWG1, working mode



- EWG1 working meetings will be held on average roughly any 4 months, with the timing aligned with developments in CIRPASS-2 and related policies
- EWG1 working meeting time slots will be announced at least 4 weeks in advance
- Core interest of CIRPASS-2 is to collect information on the development of policies related to DPP (EU and worldwide) and inform to stakeholders.
- The input will help identifying and informing the developments in a way to be suitable ideally for any kind of product and industry, and any organisation size, anywhere.
- We will also advertise and brief you about all relevant CIRPASS-2 draft deliverables in support of the consultation activities; some will be subject to EWG1 working meetings
- Other topics to exchange on will be developed based on the feedback received from EWG1 members during the Q& A now, and feedback received subsequently via surveys. (We hope for your understanding that we cannot reply to follow-up emails, given the EWG1 will have about 100 members.)
- A web portal will be used for informing all stakeholders (will align it with the developments under T5.1)

CIRPASS-2 project

Highlights from EWG4 kick off meeting on 23 September



EWG4 objective



Bring insights in the electronics industry to help with

- Clarifying benefits and challenges in implementing DPP in electronics sector
- Discovering and validating new business models
- Meeting the needs of SMEs
- Understanding the evolutions in consumer consumption
- Building electronics-specific ontologies

CIRPASS-2 project

Highlights from EWG4 kick off meeting on 23 September



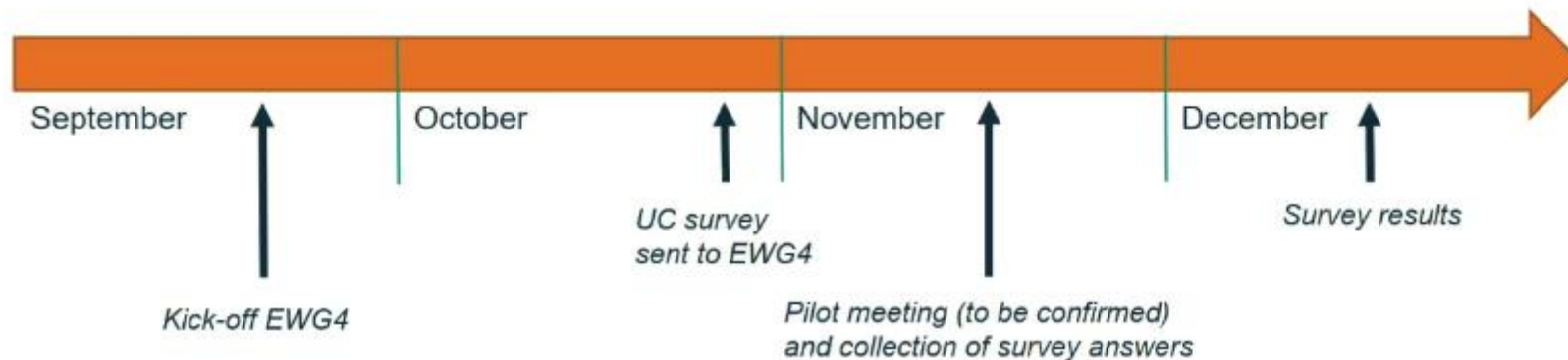
EWG4 next steps



- Survey on Use Cases for electronics DPP
- Presentation of CIRPASS-2 pilots in electronics sector

Survey will be sent end of October.

Input from Orgalim members will be needed!



CIRPASS-2 project

Highlights from EWG5 kick off meeting on 16 September



EWG5 short description



EWG5 – Customisation and Deployment of DPPs in “Other Sectors”

This group's objective is to explore the characteristics and needs of other value chains and sectors and how they would affect the implementation of DPP, taking the experience and lessons learnt from Lighthouse Pilot implementations, including producing organisations across the global economy outside those Lighthouse projects. EWG5 will mainly support WP5 and T6.6. Plus your product categories/industries' specific needs will be considered to extent possible in defining DPP system and its upper ontologies.

- Complementary industries to textile and electronics industry and their specific supply chains – please reconsider to move to those EWGs (EWG3, EWG4)
- Global scope
- Priority given to producing industry but open to DPP-related solution and service providers
- Around 120 applicants so far (waiting list)
- The 100 organisation seats will be filled by applicants that send back the signed MoU to the contacts at Digital Europe (see calendar invite to today's kick-off). Some seats will be kept for producing industry from not yet participating industries/ product categories and/or geographies.
- **!** You will be an official member of EWG5 (and potentially other suitable EWGs and/or the CoP) only after you have received back the counter-signed MoU from the project coordinator.

CIRPASS-2 project

Highlights from EWG₅ kick off meeting on 16 September



Scope of EWG₅

- **Construction products** & tyres are in the scope of EWGs
- EWG₅ will not cover Industries which are already addressed by other EWGs like textiles & electronics
- EWG₅ will not cover Industries which are not directly affected by DPP eg services & military sector which are excluded from ESPR.

CIRPASS-2 project

Highlights from EWG5 kick off meeting on 16 September



Other specific activities for EWG5, working mode



- EWG5 working meetings will be held on average roughly any 4 months, with the timing aligned with relevant developments in CIRPASS-2 and externally
- EWG5 working meeting time slots will be announced at least 4 weeks in advance
- Core interest of CIRPASS-2 is to collect information on specific needs on DPP and constraints across industries and worldwide
- We will use written surveys for this (one planned for coming weeks, after MoUs are in and group mostly formally established/"filled"), plus – to the extent practically possible - use the group online meetings including with live polls
- The input will help defining the DPP system and its upper ontologies (WP4) in a way to be suitable ideally for any kind of product and industry, and any organisation size, anywhere. Also, it will inform needs for future DPP developments for use by the European Commission (WP6)
- We will also advertise and brief you about all relevant CIRPASS-2 draft deliverables in support of the consultation activities; some will be subject to EWG5 working meetings
- Other topics to exchange on will be developed based on the feedback received from EWG5 members during the Q& A now, and feedback received subsequently via surveys. (We hope for your understanding that we cannot reply to follow-up emails, given the EWG5 will have about 100 members.)

Standardisation activities

CEN-CENELEC JTC24



European Standardization Organizations

JTC24 – Digital Product Passport – Framework and System

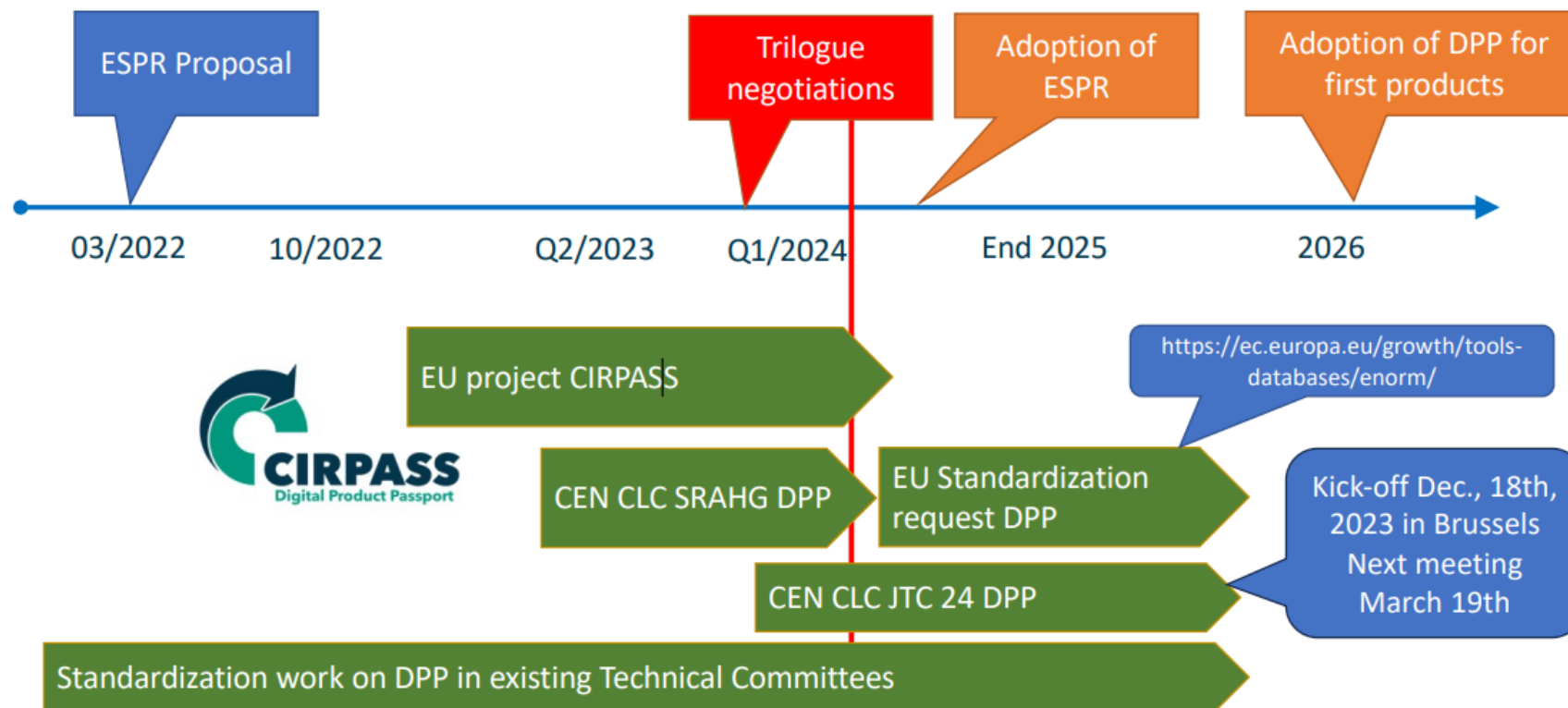
CEN CENELEC JTC 24

Convenor: Thomas Knothe,

Secretary CEN CENELEC: Carolina Müller, Secretary DIN: Katharina Sehnert

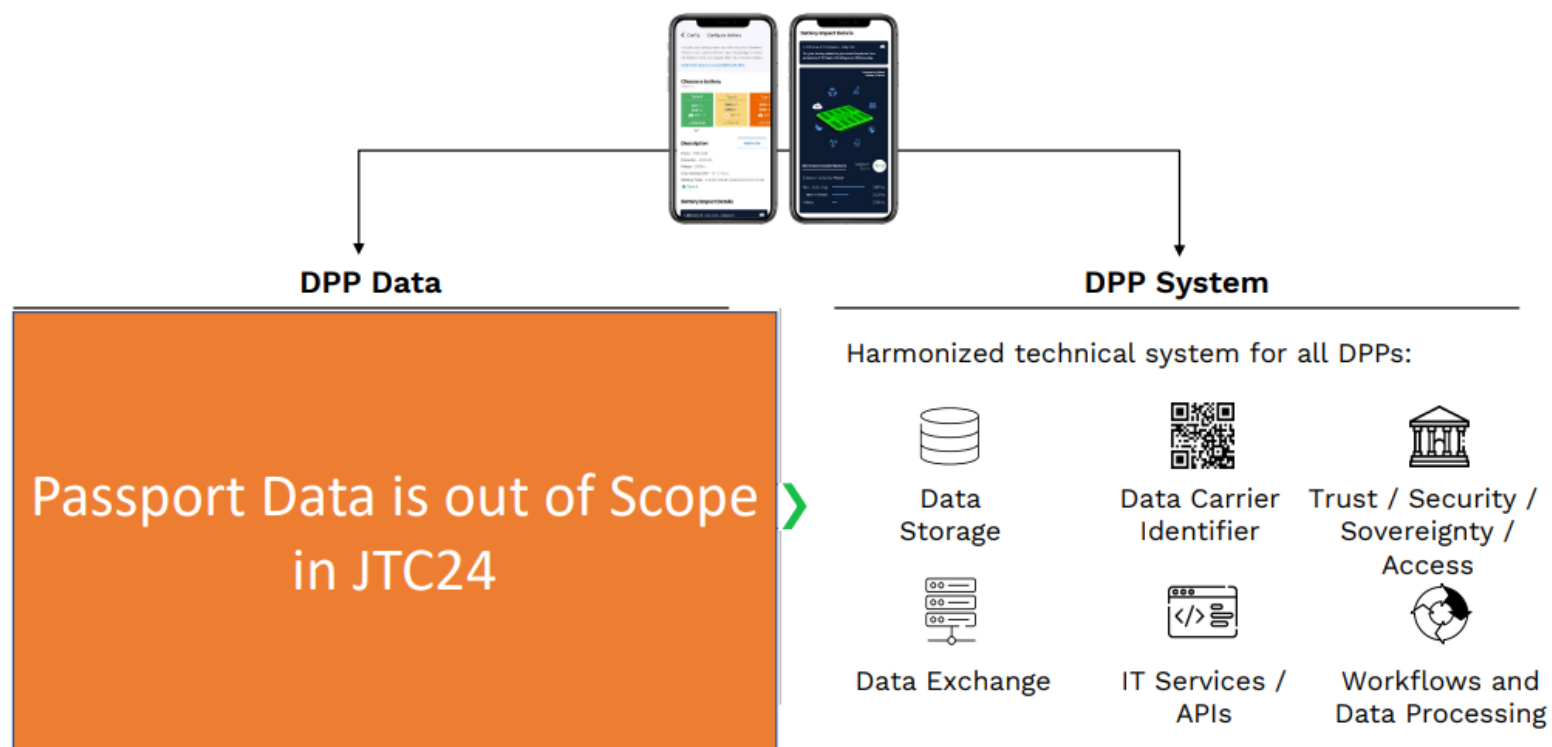
CEN-CENELEC JTC24

Overall Timeline DPP Regulation and Standardization



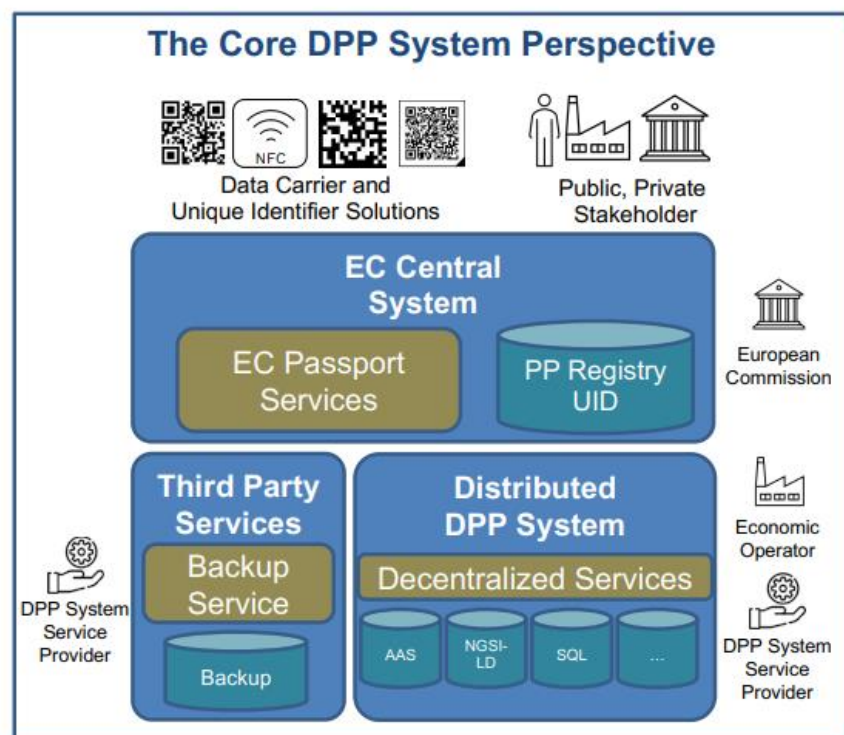
CEN-CENELEC JTC24

System Scope of JTC24 is to deliver harmonised standards for the DPP System



CEN-CENELEC JTC24

Who should be interested into JTC24



European Commission and National Authorities
(e.g. Market Surveillance)

Economic Operators, brings products on the market
(e.g. manufacturers, importers)

DPP System and Service Providers
(e.g. for operating services, backup services)

DPP System Component Suppliers
(e.g. for Data Carrier)

Partners in the value chain (e.g. supplier, dealer, recycler)
to know how data has to be provided, how to get access

Standardisation Bodies
(e.g. for sector specific data standardisation)

Consumer Organisations
to ensure applicability of DPP

Conclusions

Conclusions

- Please help us – WKO & FMTI in Austria and ORGALIM at EU level – to defend YOUR interests!
- How? By providing asap your companies' expertise and knowledge



Discussion

Discussion



Thank you for your attention!

SHAPING A FUTURE THAT'S GOOD

Thank you!



www.orgalim.eu



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[Orgalim](https://www.linkedin.com/company/orgalim)



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